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January 13, 2012

Via First Class Mail

Hon. Judge John Gleeson
225 Cadman Plaza East
Courtroom 6C
Brooklyn, New York 11201

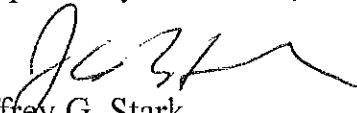
Re: Thomas v. Mortgage Electronic Registration
Systems, Inc., et al.
Civil Action No.: CV11-3656

Dear Judge Gleeson:

At the direction of Magistrate Judge Levy, we are writing this letter pursuant to paragraph 2(A)(i) of your Rules to ask permission to file a motion to dismiss the complaint against the Barrett Daffin defendants for lack of personal jurisdiction pursuant to Federal Rules of Civil Procedure 12(b)(2). The basis of the motion is that the Barrett Daffin defendants have no minimum business activities or contacts with New York and therefore a court sitting in New York can not exercise personal jurisdiction over those defendants.

Although the plaintiff is presently appearing *pro se*, we and the Magistrate Judge have been advised by the plaintiff at a conference held on January 10, 2012, that the plaintiff expects to be represented by counsel shortly. For that reason, we have been directed to ask permission to file a motion to dismiss pursuant to your Rules.

Respectfully submitted,


Jeffrey G. Stark

JGS:vmp

cc: Elizabeth Thomas (*via First Class Mail*)
Plaintiff pro se

Baker Botts LLP (*via First Class Mail*)
W. Zachary Hughes, Esq.
Attorneys for the Dolan Media Company Defendants